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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA  
AT ANCHORAGE

CITY OF SAINT PAUL, a municipal corporation,	)	
	)	
Plaintiff,	)	
	)	No. 3:97-cv-0181 HRH
vs.	)	
	)	
DONALD EVANS, Secretary of the United States Department of Commerce, and CONRAD C. LAUTENBACHER, JR., Administrator, National Oceanic and Atmospheric Administration, and TANADGUSIX CORPORATION, an Alaska corporation,	)	<b>UNOPPOSED MOTION BY DEFENDANT</b>
	)	<b>AND COUNTERCLAIMANT TANADGUSIX</b>
	)	<b>CORPORATION FOR EXTENSION OF</b>
	)	<b>TIME FOR THE CITY TO FILE ITS</b>
	)	<b>OPPOSITION TO TDX' FIRST MOTION</b>
	)	<b>TO COMPEL ANSWERS TO</b>
	)	<b>INTERROGATORIES AND PRODUCTION</b>
	)	<b>OF DOCUMENTS AND FOR SANCTIONS</b>
Defendant.	)	
	)	
	)	

Defendant and counterclaimant Tanadgusix Corporation ("TDX"), by and through its attorneys of record, Turner & Mede, P.C. and Law Office of Douglas F. Strandberg, P.S., hereby moves for an order granting the City an extension from November 28, 2006 until May 28, 2007 to file its Opposition to TDX' First Motion to Compel Answers to Interrogatories and Production of Documents and for Sanctions. Such motion has been discussed with the attorneys for plaintiff and counterdefendant City of Saint Paul ("City") and is unopposed by the City.

The reason for this unopposed motion is that the City and TDX are currently engaged in settlement negotiations. The negotiations involve complex land issues and require considerable coordination among the parties and their consultants. The parties believe such negotiations will be materially aided by such extensions.

The parties have made considerable progress in their settlement negotiations. Proceeding on the basis that the best way to resolve complex upland, tideland, and access issues on Saint Paul Island, especially the Harbor area, is for TDX and the City to agree on a subdivision of land in the Harbor area and to locate all existing utilities, they have exchanged several comprehensive draft settlement proposals which have significantly narrowed their differences.

The City and TDX believe that they will need another six months of such efforts to determine if a settlement can be achieved without further involvement of the Court. So by this unopposed motion by TDX they are seeking a six-month extension of each present pretrial deadline.

This unopposed motion does not affect any rights or obligations of the only other parties in this case, the Federal Defendants. As a result, it should be granted by the Court forthwith.

RESPECTFULLY SUBMITTED at Anchorage, Alaska, this 14<sup>th</sup> day of November, 2006.

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Certificate of Service

This is to certify that on this 14<sup>th</sup> day of November, 2006, a copy of the foregoing was served Electronically on:

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